

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

V.

JOHN M. FIFE, CHICAGO VENTURE
PARTNERS, L.P., ILIAD RESEARCH AND
TRADING, L.P., ST. GEORGE
INVESTMENTS LLC, TONAQUINT, INC.,
AND TYPENEX CO-INVESTMENT, LLC,

Defendants.

Civil Action No. 1:20-cv-05227

Honorable Nancy L. Maldonado

Honorable Heather K. McShain

JOINT STATUS REPORT

Pursuant to this Court’s Order dated February 1, 2023 (*see* Dkt No. 73), Plaintiff United States Securities and Exchange Commission (“SEC”) and Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants,” and, together with the SEC, “the Parties”), respectfully submit this Joint Status Report. The Parties state as follows:

A. Status of Outstanding Fact Discovery

Subsequent to the date of the Parties' most recent January 31, 2023 Status Report (*see* Dkt No. 72), on February 2, 2023, the Parties conducted a telephonic meet-and-confer to discuss certain privilege-related issues regarding the SEC and certain discovery responses regarding Defendants. On February 16, 2023, Defendants made an eighth production of documents in response to the SEC's discovery requests, and, on that same date, provided their seventh supplemental responses and objections to the SEC's Interrogatory No. 1. Also on February 16, 2023, the SEC sent a

privilege log to Defendants for certain documents that the SEC has withheld or redacted on privilege grounds in response to Defendants' discovery requests. On February 17, 2023, Defendants made a ninth production of documents in response to the SEC's discovery requests. On February 23, 2023, the SEC filed a motion to compel regarding certain of Defendants' responses to the SEC's discovery requests. (*See* Dkt No. 74). On March 1, 2023, Defendants requested a telephonic meet-and-confer regarding the February 16, 2023 privilege log that the SEC sent to Defendants. The Parties currently are in the process of scheduling that meet-and-confer call to discuss the privilege log and certain other privilege-related issues. Depending on the outcome of this upcoming meet-and-confer call, Defendants could potentially file a motion to compel.

B. Statement Regarding Settlement Discussions

There have been no discussions of a settlement since the date of the Parties' last Status Report. The Parties do not request a settlement conference at this time.

C. Other Matters

There are no other matters that the Parties wish to bring to the Court's attention at this time.

DATED: March 3, 2023

/s/ Ariella O. Guardi

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** Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March, 2023, I electronically filed a copy of the foregoing Joint Status Report through the Court's CM/ECF System, which will send notifications of the filing to all counsel of record.

/s/ Eric M. Phillips_____